



DRMS Hazardous Material Disposal Management

Presented by:

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DRMS HM Disposal Management

- **Overview**

- Basic HM Federal Stock Classes
- Current Shelf Life Materiel Disposition Policy
 - DoD 4140.27-M
- DRMS HM Disposal Process
 - DoD 4160.21-M
- DRMS HM Management Initiatives – Future Goal:
 - Redesign HM Supply/Disposition Process



HM Federal Stock Classes

What Shelf Life HM Are We Talking About?

6135 & 6140 Batteries

6810 & 6850 Chemicals

7930 Cleaning Compounds

8010 Paints, Dopes, Varnishes

8040 Adhesives

9150 Oil & Greases: Cutting, Lubricating, Hydraulic

Misc: 6505 Drugs, Biologicals, Reagents;

6830 Gases, 6840 Pest Control,

9110 Solid Fuels, 9140 Fuel Oils



DoD 4140.27-M Shelf Life Manual

- Chapter 6, Materiel Disposition, addresses:
 - Shelf Life Program Redistribution Process:
 - Materiel Retention and Exchange
 - Exchange or Sale of Non-excess
 - Negotiate Return of Materiel to Manufacturers for Reimbursement or Exchange
 - Alternative Uses or Expired Items
 - DRMS Disposal of Excess (R/T/D/S & HW Disposal)



DoD HW Reduction Efforts are Working

- Less HM turned in to DRMO
 - Federal emphasis on reduction
 - HazMart/Pharmacy Concept
 - Direct Vendor Delivery
 - Just In Time Ordering
- Condition of HM has changed
 - Poorer Condition, less quantity



DRMS HM Disposal Process

- Reutilization, Transfer, Donation (R/T/D)
- Sale – As Usable HM or Recycling as Commercial Chemical Product or as HW, Requires:
 - Environmentally Responsible Buyers
 - Large Quantities Needed for Recycling (oil)
 - Exposes DoD to Third Party Liability (e.g. Superfund Clean-ups)



Shelf Life HM Disposal

- If R/T/D/S Fails – HM Becomes HW
 - HW Service Contract Used as Disposal Means
 - Most Widely Used
 - Costly



Shelf Life HM Disposal

- Identify Property As Shelf Life HM on Turn-In Document DD Form 1348-1A / 1348-2
- Process through R/T/D/S, RTM or to HW Disposal
 - Applicable Supply Condition Codes (SCC)
 - SCC A – Shelf life expectancy of 6 months or more
 - SCC B – Shelf life expectancy of 3 to 6 months
 - SCC C – Shelf life expectancy of less than 3 months
 - SCC H – Expired Shelf Life



DRMS HM Management Initiatives / Goal

- DRMS Contract: HM Disposal Management Study (on-going)
 - Review Specific Commodities/FSC
 - Eliminate Futile/Costly R/T/D/S Attempts
 - Sales by Term or Via Sales Commercial Partner
 - Consignment Program Outside DRMS
 - Procurement Contacts – Manufacturer/Supplier “Take Back Clauses”
- Goal: Redesign HM Supply/Disposition Process



Shelf Life Program and HM Process Redesign

Support to Start a “HM Take Back” Initiative:

Establish Cross-Functional Team (e.g., JEMMS)

- Review/Implement Study Recommendations
- Identify the Items (All HM and/or Shelf Life HM)
- Calculate True Life Cycle Cost of HM Product – Add HW Disposal Costs
- Involve the Procurement Process:
 - Manufacturer’s /Supplier “Take Back” Contract Clauses
 - Align Incentives – Mutual Gain for DoD as Buyer & for Manufacturer/Supplier to “take back” HM



DRMS HM Management Initiative / Goal

- Benefits of “Redesign”
 - Maximize Supply Chain Effectiveness
 - Buy HM Management Service Not Just HM Product
 - Reduce Total Cost of Disposal Process for DoD (e.g., cost of futile sales attempts)
 - Reduce Risks (e.g., Future Superfund Liability)
 - Pollution Prevention (P2)
 - Disposal Cost Avoidance
- Leverage Industry by Building Partnerships